

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

FILED  
RICHARD W. NAGEL  
CLERK OF COURT

2023 MAY 15 PM 3:27

UNITED STATES OF AMERICA,

Plaintiff,

v.

TORI FLETCHER-SIMMONS,

Defendant.

CASE NO. 23-0107

JUDGE Nagel

INFORMATION

18 U.S.C. § 922(a)(6)

18 U.S.C. § 924(a)(2)

FORFEITURE

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1

(False Statement During the Acquisition of a Firearm)

1. On or about March 16, 2022, in the Southern District of Ohio, the defendant, **TORI FLETCHER-SIMMONS**, in connection with the acquisition of a firearm—to wit, a Taurus-manufactured, model G2C, 9mm semi-automatic pistol bearing serial number TJX12815—from Vance Outdoors, a federally licensed firearms dealer within the meaning of Chapter 44, Title 18, United States Code, did knowingly make a false and fictitious written statement on a Form 4473 to Vance Outdoors, which statement was intended and likely to deceive Vance Outdoors as to a fact material to the lawfulness of the sale of the firearm to the defendant, in that the defendant represented that she was the actual transferee/buyer of the firearm when, in fact, she was purchasing the firearm on behalf of another individual.

**In violation of 18 U.S.C. §§ 922(a)(6) and 924(a)(2).**

**FORFEITURE ALLEGATION A**

2. The allegations of this Information are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

3. Upon conviction of the offense alleged in this Information, the defendant, **TORI FLETCHER-SIMMONS**, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in such offense, including, but not limited to, a Taurus-manufactured, model G2C, 9mm semi-automatic pistol bearing serial number TJX12815.

4. Substitute Assets: If the forfeitable property, as a result of any act or omission of the defendant, **TORI FLETCHER-SIMMONS**—

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be subdivided without difficulty—

it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant, **TORI FLETCHER-SIMMONS**, up to the value of the above forfeitable property.

**Forfeiture notice pursuant to 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.**

**KENNETH L. PARKER  
UNITED STATES ATTORNEY**



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**S. COURTER SHIMEALL (0090514)  
Assistant United States Attorney**